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AMAZON.COM, INC. and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

AMAZON.COM, INC., a Delaware corporation,  
and AMAZON TECHNOLOGIES, INC.,

Plaintiff,

v.

UMER WASIM, et al.,

Defendants.

Case No. 4:23-cv-05580-DMR

**DECLARATION OF EMILY GOODELL  
IN SUPPORT OF MOTION FOR  
EXPEDITED DISCOVERY**

I declare under penalty of perjury under laws of the State of California that the foregoing is true and correct.

1. I am over the age of eighteen and am competent to testify as to the matters set forth herein. I have personal knowledge of the facts in this declaration, and base this declaration on my personal knowledge.

2. I work for the law firm Davis Wright Tremaine (“DWT”), which represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc., in this matter.

3. Obtaining a stipulation to the proposed relief is not possible because, although Plaintiffs have begun serving the approximately fifteen U.S.-based Defendants, no Defendants have yet formally appeared in the case. There is currently no Defendant with a filed appearance with whom Plaintiffs can enter a stipulation.

Executed this 4<sup>th</sup> day of December, 2023 in Seattle, Washington.

By: s/ Emily Goodell  
Emily Goodell (*pro hac vice*)

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